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**BY ECF**

January 15, 2025

The Honorable Robyn F. Tarnofsky  
United States Magistrate Judge  
United States District Court, Southern District of New York  
500 Pearl Street, Room 703  
New York, NY 10007

Re: *Parker v. Bursor*, 24-cv-245 (JGLC) (RFT), Re: Letter Motion for Leave to  
File a Motion to Compel Production of Documents Related to Carlos Carvajal  
and Robert Hantman

Dear Judge Tarnofsky:

This letter is in response to the January 3, 2025, letter motion of the defendant's counsel (Dkt. No. 239) and is being written on behalf of myself, Robert Hantman, a lawyer for fifty years, and founding member of Hantman Associates ([www.hantmanlaw.com](http://www.hantmanlaw.com)).

As I did not receive the sealed pleadings and exhibits for almost 14 days and our phone conference is scheduled for this Friday, I will limit my response to the letter itself. However, I believe that it is important to share with Your Honor my letter of December 28, 2024 (attached as Exhibit 1), as it is obvious that the defendants seek to divert attention from the sad and pathetic relationship between the parties by creating issues having nothing to do with this case.

In any event, I have the permission of the plaintiff and her counsel to turn over all of my documents and communications, as I have communicated with opposing counsel regarding these matters (see Exhibit 2), so there is no need to waste the Court's time by my responding to anything further as the balance of their letter seeks to disparage me and others in an attempt to get money or to put pressure on plaintiff to drop her case.

As to the Declarations of Charles S. Korschun Esq. and defendant, they are submitted to create a false record and are no substitute for actual proof.

Very sincerely yours,  
/s/ Robert J. Hantman, Esq.

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